

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KARUNAMUNIGE CHAMILA	:	Civil Action No.: 09-5395 (BMC)(JSA)
KRISHANTHI, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
v.	:	CONSENT ORDER EXTENDING
	:	DISCOVERY
RAJAKUMARA	:	
RAJARATNAM, <i>et al.</i>	:	
	:	
Defendants.	:	

THIS MATTER having come before the Special Master on the joint application of the parties to extend certain deadlines established in the Scheduling Order entered on February 7, 2025 (ECF No. 565); and

WHEREAS, the Special Master having considered the positions of counsel for the parties, all parties having consented to the relief sought herein, and for good cause having been shown;

IT IS on this 31st day of July, 2025

1. **ORDERED** that the Parties continue to meet and confer in good faith to reach agreement on objections posed to the pending Phase II discovery requests.
2. **ORDERED** that the Parties shall complete the production of written discovery within sixty (60) days of the date on which the Parties reach agreement on all objections posed to the pending Phase II discovery requests. To the extent the Parties do not reach agreement on all objections posed to the pending Phase II discovery requests, any unresolved disputes must be brought to the Special Master's attention by **August 22, 2025** in the form of either a motion to compel or a motion for protective order. Any oppositions to these motions must be filed by **September 5, 2025**. No replies will be

permitted without leave of the Special Master. The Parties shall complete the production of written discovery within sixty (60) days of the date on which the Special Master issues an Order addressing the discovery disputes.

3. **ORDERED** that the Parties must meet and confer in a good-faith effort to resolve any dispute regarding the remaining Phase II discovery schedule, scope, and depositions within thirty (30) days of the completion of written discovery. Any unresolved disputes must be brought to the Court's attention promptly by a joint letter to the Special Master.
4. **ORDERED** that a virtual conference is scheduled for **September 19, 2025, at 10:00 a.m.** Access information will be circulated prior to the conference. The Parties are directed to file a joint status letter no later than **September 12, 2025**, addressing the status of discovery.

/s/ Joseph A. Dickson

**Hon. Joseph A. Dickson, U.S.M.J. (Ret.)
Special Master**